

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

AVRAHAM EISENBERG,

Plaintiff,

v.

NUMERIS LTD., SASHA IVANOV, AND
DOES 1-10,

Defendants.

Civil Action No. 3:22-cv-01325-ADC

MOTION REQUESTING ISSUANCE OF SUBPOENAS

TO THE HONORABLE COURT:

HEREIN appears Plaintiff, **AVRAHAM EISENBERG**, through his undersigned counsel and most respectfully prays and requests:

1. Attached for issuance by the Clerk are subpoenas directed to Medium Corporation, Twitter, Inc., and GitBook Inc. and GitHub, Inc., requesting documents sufficient to obtain the identities of the unnamed defendants referenced in the complaint.

WHEREFORE it is respectfully requested that the Court order the Clerk to issue the subpoenas herein included.

Dated: September 2, 2022

Respectfully submitted,

Dunlap Bennett & Ludwig PLLC

By: s/ Cortland C. Putbrese
Cortland C. Putbrese
Puerto Rico Federal Bar No. 305708
8003 Franklin Farms Dr., Suite 220
Richmond, Virginia 23229
Tel. 804.977.2688
Fax 804.977.2680
cputbrese@dbllawyers.com

Creedon PLLC

James H. Creedon, *pro hac vice*
Texas Bar No. 24092299
Christian Cowart, *pro hac vice*
Texas Bar No. 24105748
5 Cowboys Way, Suite 300
Frisco, Texas 75034
Tel. 972.850.6864
Fax 972.920.3290
jhcredon@credon.com
ccowart@credon.com

Johnson Friedman Law Group, PLLC

Samuel H. Johnson, *pro hac vice*
Texas Bar No. 24065507
7161 Bishop Road, Suite 220
Plano, TX 75024
Tel. 214.382.0300
Fax 214.466.2481
sam@jfbusinesslaw.com

ATTORNEYS FOR PLAINTIFF
AVRAHAM EISENBERG

CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2022, I caused a true and correct copy of the foregoing to be filed on the Court's CM/ECF system, which served notice on all counsel of record.

By: s/ Cortland C. Putbrese
Cortland C. Putbrese

CERTIFICATE OF CONFERENCE

No defendant has appeared yet in this case, and therefore, pursuant to Local Rule 7.1b, undersigned counsel states that he is unable to meet and confer with the defendants and unable to state whether this motion is opposed.

By: s/ Cortland C. Putbrese
Cortland C. Putbrese